

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

UNITED STATES OF AMERICA

v.

CRIMINAL NO. **3:20cr22-CWR-FKB**

SALVADOR DELGADO-NIEVES

8 U.S.C. § 1324(a)(1)(A)(iii)

18 U.S.C. § 911

18 U.S.C. § 1546(a)

18 U.S.C. § 1001

**The Grand Jury charges:**

COUNT 1

On or about the February 19, 2018, in Rankin County, in the Northern Division of the Southern District of Mississippi, the defendant, **SALVADOR DELGADO-NIEVES**, did aid and abet others known and unknown to the grand jury who knowing and in reckless disregard of the fact that an alien, namely, LSA a/k/a MC a/k/a TSO a/k/a LS, had come to, entered and remained in the United States in violation of law, did conceal, harbor, and shield from detection such alien in buildings and other places for the purpose of commercial advantage and private financial gain.

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii), and Title 18, United States Code, Section 2.

COUNT 2

On or about the March 13, 2017, in Rankin County, in the Northern Division of the Southern District of Mississippi, the defendant, **SALVADOR DELGADO-NIEVES**, did aid and abet others known and unknown to the grand jury who knowing and in reckless disregard of the fact that an alien, namely, EARC a/k/a ER, had come to, entered and remained in the United States in violation of law, did conceal, harbor, and shield from detection such alien in buildings and other places for the purpose of commercial advantage and private financial gain.

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii), and Title 18, United States Code, Section 2.

COUNT 3

On or about the March 17, 2017, in Rankin County, in the Northern Division of the Southern District of Mississippi, the defendant, **SALVADOR DELGADO-NIEVES**, did aid and abet others known and unknown to the grand jury who knowing and in reckless disregard of the fact that an alien, namely, CCP a/k/a CP, had come to, entered and remained in the United States in violation of law, did conceal, harbor, and shield from detection such alien in buildings and other places for the purpose of commercial advantage and private financial gain.

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii), and Title 18, United States Code, Section 2.

COUNT 4

On or about February 19, 2018, in Rankin County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **SALVADOR DELGADO-NIEVES**, did aid and abet, LSA a/k/a MC a/k/a TSO a/k/a LS, an alien in the United States, who falsely and willfully represented himself to be a citizen of the United States.

All in violation of Title 18, United States Code, Sections 911 and 2.

COUNT 5

On or about March 13, 2017, in Rankin County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **SALVADOR DELGADO-NIEVES**, did aid and abet, EARC a/k/a ER, an alien in the United States, who falsely and willfully represented himself to be a citizen of the United States.

All in violation of Title 18, United States Code, Sections 911 and 2.

COUNT 6

On or about March 17, 2017, in Rankin County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **SALVADOR DELGADO-NIEVES**, did aid and abet, CCP a/k/a CP, an alien in the United States, who falsely and willfully represented himself to be a citizen of the United States.

All in violation of Title 18, United States Code, Sections 911 and 2.

COUNT 7

On or about February 19, 2018, in Rankin County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **SALVADOR DELGADO-NIEVES**, did aid and abet LSA a/k/a MC a/k/a TSO a/k/a LS, to knowingly possess, utter, use and attempt to use a document prescribed by statute and regulation for evidence of authorized stay or employment in the United States, that is a Social Security Card, which card the defendant knew to be forged, counterfeited, altered, and falsely made.

All in violation of Title 18, United States Code, Sections 1546(a) and 2.

COUNT 8

On or about March 13, 2017, in Rankin County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **SALVADOR DELGADO-NIEVES**, did aid and abet EARC a/k/a ER, to knowingly possess, utter, use and attempt to use a document prescribed by statute and regulation for evidence of authorized stay or employment in the United States, that is a Social Security Card, which card the defendant knew to be forged, counterfeited, altered, and falsely made.

All in violation of Title 18, United States Code, Sections 1546(a) and 2.

COUNT 9

On or about March 17, 2017, in Rankin County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **SALVADOR DELGADO-NIEVES**, did aid and abet CCP a/k/a CP, to knowingly possess, utter, use and attempt to use a document prescribed by statute and regulation for evidence of authorized stay or employment in the United States, that is a Social Security Card, which card the defendant knew to be forged, counterfeited, altered, and falsely made.

All in violation of Title 18, United States Code, Sections 1546(a) and 2.

COUNT 10

On or about September 20, 2019, **SALVADOR DELGADO-NIEVES**, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by denying that he had hired illegal aliens for employment with A&B, Inc., at Pelahatchie, Mississippi, in Rankin County in the Northern Division in the Southern District of Mississippi. The statements and representations were false because, as **SALVADOR DELGADO-NIEVES** then and there knew, he had hired illegal aliens for employment at A&B, Inc. at Pelahatchie, Mississippi.

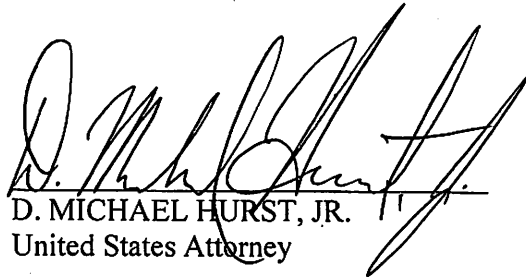
All in violation of Title 18, United States Code, Section 1001.

**NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE**

As a result of committing the offenses as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited

with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Title 18, United States Code, Section 982(a)(6), Title 8 United States Code, Section 1324(b), and Title 28 United States Code, section 2461.



D. MICHAEL HURST, JR.  
United States Attorney

A TRUE BILL:  
S/SIGNATURE REDACTED  
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the Grand Jury on this the 12<sup>th</sup> day of February, 2020.



UNITED STATES MAGISTRATE JUDGE